

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Court File No. 17-cv-136 (RHK/FLN)

KLEINBANK,

Defendant.

STIPULATION FOR EXTENSION OF BRIEFING SCHEDULE

The United States and KleinBank hereby stipulate to the following schedule for briefing KleinBank's pending motion to dismiss the Complaint and request the Court to issue an order in conformity therewith. The schedule below provides a sixty (60) day extension from the Court's Standing Order for the government to respond and a seven (7) day extension to KleinBank for its reply brief.

1. The parties propose and request the following briefing schedule:
 - a. KleinBank will file its Memorandum in Support of Motion to Dismiss one hundred nine days (109) days prior to the hearing date.
 - b. The Government will file its responsive memorandum twenty-eight (28) days prior to the hearing date.
 - c. KleinBank will file any reply memorandum fourteen (14) days before the hearing date.
 - d. The parties jointly request the Court to set the hearing date on or after September 19, 2017.

2. Federal Rule of Civil Procedure 6(b)(1) provides that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A). Because this request is made prior to May 15, 2017, the date on which KleinBank’s motion to dismiss currently is due, the request is timely.

3. Good cause exists for the requested extensions. Because of the federal government’s change in administration, the confirmation of a new Attorney General, and a transition in leadership within the Civil Rights Division, the United States requires additional time to brief the new leadership of the Department on this case and the issues to be addressed in its response before making any representations to the Court.

Respectfully submitted,

By: s/ John W. Lundquist

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DATED: May 4, 2017

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